

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
DAYTON DIVISION**

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|---------------------------------------|---|--------------------------------|
| JOHN AND JANE DOE NO. 1, et al | : | CASE NO: 3:22-cv-00337 |
| | : | |
| PLAINTIFFS, | : | JUDGE MICHAEL J. NEWMAN |
| | : | |
| vs. | : | |
| | : | |
| BETHEL LOCAL SCHOOL DISTRICT | : | |
| BOARD OF EDUCATION, et al | : | |
| | : | |
| Defendants. | : | |

**MOTION TO FILE CONFIDENTIAL DOCUMENT UNDER SEAL IN SUPPORT OF
DEFENDANTS' MOTION IN LIMINE, TO STRIKE AND TO REMOVE**

Defendants Bethel Local School District Board of Education, and Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King and Matthew Chrispin, in their official capacities ("collectively referenced as "Defendants BOE"), move the Court for an Order allowing the filing of a confidential documents protected by the Stipulated Protective Order (Doc 11) from public view. The confidential document is evidence submitted by Defendants BOE in support of their Motion in Limine, to Strike and to Remove. All counsel were contacted regarding the filing of this motion and none oppose. The following memorandum fully supports this motion.

Respectfully submitted,

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*Schools District Board of Education, and
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Lori Sebastian, Natalie Donahue, Danny
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MEMORANDUM

Defendants BOE, in filing their Motion in Limine, To Strike and To Remove rely upon an email between former Superintendent Justin Firks, Principal Triplett and Joanne Roe which they mark as confidential under the issued Protective Order (Doc.11) because disclosure of the non-public records would violate Anne Roe's privacy and FERPA protections. For this reason, the email, which contains sensitive and confidential information, relevant evidence to the claims and defenses at issue in the Motion in Limine, To Strike and to Remove is requested to be filed under seal. All counsel were contacted as to the filing of this motion and none oppose.

Respectfully submitted,

s/ Lynnette Dinkler

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of February, 2023, I served the foregoing, via the Court's CM/ECF E-filing System which will send notification to the following:

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